

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF OHIO**

<b>IN RE:</b>	)	<b>Case No. 13-55989</b>
<b>William Hawthorne Jr.</b>	)	
	)	<b>Chapter 13</b>
	)	
<b>Debtor</b>	)	<b>Judge Preston</b>
	)	

**NOTICE OF MOTION TO MODIFY CONFIRMED PLAN**

The Debtor has filed papers with the Court to modify their confirmed Plan.

**Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult with one.)**

If you do not want the Court to grant the relief sought in the Motion, then on or before **twenty-one (21)** days from the date of service of the Motion, you or your attorney must:

1. File with the Court, a responsive memorandum explaining your position, at 170 N. High St. Columbus, Ohio 43215.
2. If you mail your responsive memorandum to the Court for filing, you must mail it early enough so the Court will receive it on or before the date stated above.
3. You must also mail a copy of your responsive memorandum to the undersigned, creditor's attorney, and to all parties, besides yourself, listed on the Certificate of Service provided below.

If you or your attorney do not take these steps, the Court may decide that you do not oppose the relief sought in the Motion and may enter an order granting that relief.

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF OHIO

IN RE:	)	BANKRUPTCY CASE NO. 13-55989
<b>William Hawthorne Jr.</b>	)	
	)	
	)	
DEBTOR	)	CHAPTER 13
	)	
	)	JUDGE PRESTON
	)	

**MOTION TO MODIFY CONFIRMED PLAN**

Now come the Debtor, **William Hawthorne Jr.** by and through its undersigned counsel, and move to make the following modifications to the above plan.

1. The original plan was stated to increase plan payment to \$850.00 per from \$590.00 starting August 28th 2015, the debtors business has not had a increase in income as anticipated; therefore the debtor can only afford a increase to \$700.00 per month for remainder of the plan.
2. The percentage to unsecured creditors will remain unchanged currently at 1%.

Once approved the plan will complete in 60months.

Original Plan was confirmed on December 27th, 2013. The 1st amended plan was filed September 13th, 2013, 2nd amended plan was filed November 21st, 2013.

Attached Amended schedules I & J.

WHEREFORE, the Debtors moves the Court to allow the above modification to the confirmed plan.

Respectfully,

/s/ Karen E. Hamilton (0064808)  
Attorney for Debtor  
31 E. Whittier Street  
Columbus, Ohio 43206  
(614) 443-7920 (614) 443-7922 fax

**CERTIFICATE OF SERVICE**

I hereby certify that on the 20th day of August 2015, a copy of the Notice of Motion to Modify and the Motion to Modify Confirmed Plan, was served on the following registered ECF participants, electronically through the Court's transmission facilities at their email addresses with the Court:

Office of the U.S. Trustee  
\* Served electronically.

Frank M Pees, Chapter 13 Trustee  
\* Served electronically.

Edward Henry Cahill  
\*Served electronically

Karen E. Hamilton  
\* Served electronically

Brian M Gianangeli  
\* Served electronically

Bethany Hamilton  
\* Served electronically

/s/ Karen E. Hamilton  
Attorney for Debtor  
31 E. Whittier Street  
Columbus, Ohio 43206  
(614) 443-7920  
(614) 443-7922 fax

The following parties were served by Regular US mail postage prepaid to 20th day of August 2015.**attached creditor matrix**